

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

No. 1:16-cr-10165-MLW-6

DENNIS PLEITES RAMOS,  
Defendant.

**DEFENDANT'S MOTION FOR CONSIDERATION FOR ENTRY INTO  
THE RISE PROGRAM AND TO SCHEDULE A RULE 11 HEARING**

The defendant, Dennis Pleites Ramos ("Ramos"), by and through undersigned counsel, hereby respectfully moves this Honorable Court to consider him for placement into the RISE program. As grounds therefor, Ramos avers and states as follows:

1. On June 8, 2016, Ramos was indicted for one (1) count of conspiracy to willfully engage in the business of dealing in firearms. Ramos was not charged in any other counts set forth in the indictment, other than in the firearm forfeiture allegation. *See* ECF # 3.
2. Ramos was arrested the following day, June 9, and entered his initial appearance before Magistrate Judge Donald L. Cabell. He was arraigned on June 29 and subsequently released on conditions on July 1 following a detention hearing. The conditions of Ramos' release included, *inter alia*, no unlawful use or possession of a controlled substance, random drug screening and participation in an inpatient or outpatient substance abuse program as directed by U.S. Pretrial Services. *See* ECF # 64.
3. On January 11, 2017, a summons issued for Ramos' arrest due to violations of the terms of pretrial release. A hearing was held on January 25, 2017 on these violations. According to USPO Thomas O'Brien, Ramos has tested positive for either opiates,

ALLOWED  
W.G. 4, DJ  
OCT 5, 2017